Docket Nos. 01-0465/01-0530/01-0637 (Consolidated) ICC Staff Exhibit 6.0

DIRECT TESTIMONY

of

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Senior Rate Analyst Rates Department Financial Analysis Division Illinois Commerce Commission

Approval of Delivery Services Tariffs and Delivery Services Implementation Plan Central Illinois Light Company

Docket Nos. 01-0465/01-0530/01-0637 (Consolidated)

November 28, 2001

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ATTACHMENTS

1 – CILCO Response to Staff Data Request DLS-11

5 - CILCO Revised Exhibit 2.9 - Revised - Docket No. 01-0637

- 2 CILCO Response to Staff Data Request DLS-13
- 3 CILCO Response to Staff Data Request DLS-14

I. WITNESS QUALIFICATION

- 2 Q. Please state your name and business address.
- 3 A. Dennis L. Sweatman, 527 East Capitol Avenue, Springfield, Illinois 62701.

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- 5 Q. What is your present position with the Illinois Commerce Commission?
- A. My present position is Senior Rate Analyst in the Rates Department of the
 Financial Analysis Division. In that position, I review and analyze tariff filings by
 electric, gas, and water utilities with regard to cost of service and rate design. I
 make recommendations to the Commission on such filings and participate in
 docketed proceedings as assigned. Currently, I am assigned to evaluate the
 cost of service and rate design aspects of Central Illinois Light Company's
- 12 (CILCO) proposed delivery services tariffs, filed October 3, 2001, and November
- 13 9, 2001.

- 15 Q. Please state your professional qualifications and work experience.
- 16 A. I received a Bachelor of Arts degree in Political Science from Augustana College
- and a Master of Arts degree in Public Administration from the University of Illinois
- Springfield (formerly Sangamon State University). Prior to assuming my current
- 19 position within the Financial Analysis Division in December 1997, I served as
- 20 Director of the Commission's Economic Development Program, starting in 1986.
- As part of my responsibilities in that capacity. I conducted analyses of economic
- development issues and completed evaluations of special electric and gas rate
- 23 structures primarily designed for economic development and load retention

purposes. From 1992 to December 1997, I was also Assistant Manager of the Energy Programs Division. Prior to December 1986, I was employed by the City of Springfield, Illinois, as Manager of Economic Development. In that capacity, I was responsible for structuring economic development financing and incentive packages, preparing applications for state and federal program assistance, and administering the various economic development programs of the City of Springfield.

Q. Have you testified in any previous Commission dockets?

A. Yes. I prepared testimony in Docket No. 89-0276 (Illinois Power) on the subject of economic development/incentive rates. I also prepared testimony in Docket No. 92-0270 (Central Illinois Public Service) regarding the economic development aspects of utilities' strategic load growth programs. I also submitted testimony in Docket No. 93-0425 (Commonwealth Edison) concerning the Commission's evaluation criteria related to load retention rate structures. I prepared testimony in Docket No. 94-0134 (Illinois Power) in regard to the appropriateness of using utility discounted rate structures to compete for municipal customers. I submitted testimony in Docket Nos. 98-0348 (Illinois Power), 98-0349 (MidAmerican Energy), and 98-0362 (Commonwealth Edison) related to real-time pricing issues and compliance of filed tariffs with Section 16-107 of the Public Utilities Act. I prepared testimony in Docket No. 98-0546 (AmerenUE) in regard to cost of service and rate design issues. I submitted testimony in Docket Nos. 99-0119/99-0131, consolidated (CILCO) and 99-

0122/99-0130, consolidated (MidAmerican Energy Company) in regard to cost of service and rate design issues related to delivery services tariffs (DST) filed pursuant to Section 16-108 of the Public Utilities Act. In Docket No. 99-0013, I prepared testimony in regard to cost of service and rate design issues related to unbundling of non-residential electric DST for CILCO and MidAmerican Energy Company. I also submitted testimony in Docket Nos. 00-0620/00-0621, consolidated (Nicor Gas) regarding cost justification for supplier charges under the Customer Select Program. In Docket Nos. 01-0469 and 01-0470 (North Shore Gas and Peoples Gas), I prepared testimony in regard to savings associated with reduced gas storage inventory. In Docket No. 01-0444, I submitted testimony in regard to cost of service and rate design issues related to residential DST filed by MidAmerican Energy Company. PURPOSE OF TESTIMONY

II.

62 Q. What is the subject matter of your testimony?

Α. My testimony presents the results of my analyses of CILCO's proposed delineation of transmission and distribution (T&D) facilities and CILCO's DST cost of service study and rate design proposals.

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- 67 Q. How is your testimony organized?
- 68 Α. First, I address CILCO's delineation of transmission and distribution facilities, as 69 filed in Docket No. 01-0465. Second, in regard to Docket No. 01-0637, I review 70 a) CILCO's functional cost study which allocates the totals from each Federal 71 Energy Regulatory Commission (FERC) account to functional categories related 72 to distribution and to DST customer classes; b) CILCO's calculation of revenue 73 requirements for DST customer classes; and c) CILCO's proposed rate design 74 for DST customer classes. In addition to comparing CILCO's proposed 75 methodology with the approach approved in Docket Nos. 99-0119/99-0131, 76 consolidated (CILCO's 1999 non-residential DST proceeding), I also make 77 recommendations for modifications to CILCO's proposals.

- 79 Q. Please summarize the results of your analyses.
- In regard to Docket No. 01-0465, I recommend that CILCO's No. 9170000 80 A. 81 common plant accounts be allocated to gas and electric on the same basis as 82 other CILCO service centers. CILCO agrees with my recommendations. I also 83 recommend the use of a different allocator to allocate general plant costs to 84 distribution. In regard to Docket No. 01-0637, the results of my analyses indicate 85 that revisions are needed to CILCO's cost of service study and rate design 86 proposals. My recommendations result in different DST rates than proposed by 87 CILCO. The primary differences are related to my recommendation to recover 88 costs associated with the Customer Meter Regulatory Obligation, Meters, and 89 Meter Reading distribution functional categories in the meter service charge

rather than the customer charge, as proposed by CILCO. I also recommend changes to CILCO's proposed use of combined DST rate classifications to develop customer, usage, and access charges. In addition, I recommend revisions to Rider MS related to depicting typical meter service charges for DST rate classifications. Possible additional recommendations will be addressed in my rebuttal testimony, pending CILCO's responses to the second set of data requests from the Illinois Industrial Energy Consumers (IIEC).

III. DELINEATION OF TRANSMISSION AND DISTRIBUTION FACILITIES

A.

Q. Why is it necessary to evaluate CILCO's proposed functionalization between transmission and distribution for common and general plant accounts, as presented in the direct testimonies of CILCO witnesses Getz (CILCO Exhibit 2.0) and Bilsland (CILCO Exhibit 3.0) in Docket No. 01-0465?

The delineation of transmission and distribution facilities serves as a prelude to the review of CILCO's residential DST filing. The delineation of such facilities provides the basis for CILCO's electric distribution rate base and revenue requirement in this DST proceeding. Since CILCO elected to functionalize common and general plant accounts in Docket No. 01-0465, it is important to determine the accuracy of CILCO's functionalization in relation to this residential DST proceeding.

112	Q.	Do the findings from Docket No. 01-0465 preclude subsequent revisions to
113		CILCO's proposed functionalization and allocation for DST in Docket No. 01-
114		0637?
115	A.	No. Staff has conducted the usual review of CILCO's delivery services cost of
116		service study, rate design proposals, and tariffs. Staff's recommendations for
117		revisions in Docket No. 01-0637 supplement the findings in the transmission-
118		distribution delineation proceeding.
119		
120	Q.	How did you evaluate CILCO's proposed delineation between transmission and
121		distribution facilities?
122	A.	My evaluation focused on the proposed functional allocation of common and
123		general electric plant accounts, as depicted in CILCO Exhibit 2.1, Exhibit C
124		(Docket No. 01-0465). I evaluated the cost basis and reasonableness of the
125		allocations between gas and electric functions as well as between electric
126		distribution and transmission for the common and general plant accounts. Based
127		on these analyses, I reached conclusions regarding the appropriateness of the
128		allocations and recommended certain changes.
129 130		
131	Q.	Please discuss the results of your analysis of CILCO's proposed functionalization
132		of common and general plant to electric distribution.
133	A.	My review of CILCO WP C-1 (Common Plant in Service) revealed that CILCO
134		account No. 9170000, titled "Downtn Off Liberty St" (line 25) was allocated on a
135		different basis than the other CILCO service centers. Instead of allocating 50%

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136		of the Liberty Street office to gas and 50% to electric, as in the case of the other
137		service centers, CILCO used "net plant" as the allocator for No. 9170000
138		accounts associated with the Peoria office facility. In my opinion, the Liberty
139		Street office should be allocated on the same basis as the other service centers.
140		
141	Q.	What was the basis of CILCO's "50/50" allocator?
142	A.	CILCO based the 50/50 allocator on the overall percentage of gas and electric
143		customers. According to CILCO's Year-2000 Federal Energy Regulatory
144		Commission (FERC) Form 1 information (page 300), CILCO has 199,876 electric
145		customers and 205,375 gas customers. The corresponding percentages of total
146		customers are 49.32% for electric and 50.68% for gas. Based on this
147		information, CILCO rounded each percentage to 50% for use in allocating costs.
148		
149	Q.	Do you agree that the 50/50 allocator should be used to split plant costs
150		associated with CILCO's service centers?
151	A.	Yes. Even though an argument could be made that a 49% electric and 51% split
152		would be more technically accurate, it is also likely that the number of gas and
153		electric customers changes over time, resulting in continuing increases and
154		decreases in the percentages.
155		

150	Q.	How did using the 50/50 allocator change the allocation of the Liberty Street
157		office?
158	A.	Using the 50/50 allocator moved approximately \$1,494,500 from electric
159		distribution to gas. At Staff's request, CILCO prepared and provided to Staff
160		CILCO WP C-2, which illustrates not only the use of the 50/50 allocator for the
161		Liberty Street Office 9170000 accounts, but also depicts the various common
162		plant categories by FERC account number. CILCO WP C-2 is attached to my
163		testimony as Schedule 1.
164		
165	Q.	Did you compare CILCO's proposed allocation of common and general plant for
166		the 2000 test year to the 1997 test year as used by CILCO in Docket Nos. 99-
167		0119/99-0131, consolidated (CILCO's non-residential DST proceeding)?
168	A.	Yes. I requested and received from CILCO a breakdown by FERC account of
169		common and general plant amounts for test years 1997 and 2000 (shown in
170		Schedule 2). That information showed that CILCO's 2000 test year common and
171		general plant electric proposed distribution total of \$52,470,777 ¹ is \$16,533,645
172		more than the 1997 test year proposed total of \$37,937,132. The majority of the
173		increase (86%) is derived from common plant accounts. Specifically, FERC
174		accounts 303 and 391 accounted for most of the common plant increase. These
175		two accounts include computer software/hardware and related office costs,
176		which, as discussed in CILCO Exhibit 3.0, p. 6, lines 115-121 (Docket No. 01-
177		0465), are associated with the implementation of CILCO's Customer/1 CIS

178		computer system. Even with the increases, CILCO's proposed percentage of
179		total general and common plant amounts allocated to electric distribution was
180		approximately equal (55% in 1997 and 56% in 2000).
181		
182	Q.	Does the comparison shown in Schedule 2 accurately depict the results of
183		Docket Nos. 99-0119/99-0131, consolidated?
184	A.	No. The amount of general plant actually approved for distribution in CILCO's
185		non-residential docket was reduced from CILCO's proposal. The general plant
186		distribution amount approved in the non-residential DST docket totaled
187		\$9,823,000, compared to \$19,652,950 proposed by CILCO.
188		
189	Q.	What methodology was approved in Docket Nos. 99-0119/99-0131, consolidated
190		for allocating general plant costs to distribution?
191	A.	The approved distribution amount for general plant was based on a labor
191 192	A.	The approved distribution amount for general plant was based on a labor allocator that included electric generation, transmission, and distribution. The
	A.	
192	A.	allocator that included electric generation, transmission, and distribution. The
192 193	A. Q.	allocator that included electric generation, transmission, and distribution. The
192 193 194		allocator that included electric generation, transmission, and distribution. The distribution amount represented approximately 41% of the total. ²
192 193 194 195		allocator that included electric generation, transmission, and distribution. The distribution amount represented approximately 41% of the total. ² Does CILCO's proposed general plant allocation to distribution in this residential
192 193 194 195 196		allocator that included electric generation, transmission, and distribution. The distribution amount represented approximately 41% of the total. ² Does CILCO's proposed general plant allocation to distribution in this residential DST proceeding conform to the method approved in Docket Nos. 99-0119/99-

¹ The 2000 total includes the recommended reduction associated with the Peoria Office facility noted earlier in this testimony.

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- Q. What is your recommendation regarding CILCO's proposed allocation of general plant in this residential DST proceeding?
- A. In my opinion, a labor allocator should be used that reflects electric generation,
 transmission, and distribution, which is the same methodology approved in
 Docket Nos. 99-0119/99-0131, consolidated. For purposes of implementing this
 recommendation, CILCO allocator AF1 should be used instead of CILCO
 allocator AF2 (CILCO WPC-1d, p. 1 of 6) to allocate general plant costs to
 distribution. The percent allocated to distribution under allocator AF1 is 46%,
 compared to 86% under allocator AF2, which excludes electric generation.

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- Q. What is the result of using allocator AF1 instead of allocator AF2 to assigngeneral plant costs?
- A. The result is that \$11,836,120 of CILCO's general plant costs would be allocated to distribution instead of \$21,965,165 as proposed by CILCO.

- Q. Please summarize your recommendations in regard to CILCO's delineation oftransmission and distribution facilities.
- A. Based on my analysis of CILCO's filing in Docket No. 01-0465, I recommend that

 CILCO No. 9170000 common plant accounts, which comprise the Liberty Street

 office facility, be allocated to gas and electric on the same basis as other CILCO

 service centers. The result is that the \$32,000,121 figure for Electric Distribution.

² This same labor allocator was used to allocate administrative and general expenses, as discussed later in my testimony.

shown on line 42 in CILCO WP C-1, Common Plant in Service, should be changed to \$30,505,612 as shown on line 48 in my Schedule 1 (CILCO WP C-2). In supplemental direct testimony (CILCO Exhibit No. 2.2, Docket No. 01-0465), CILCO agreed to using the 50/50 allocator for CILCO No. 9170000 accounts.³ I also recommend using CILCO allocator AF1 instead of allocator AF2 to allocate general plant costs to distribution. Revisions to CILCO's cost study, necessary to accomplish this recommendation, will be addressed in my rebuttal testimony due to the late receipt of clarifying information contained in CILCO's responses to Illinois Industrial Energy Consumers (IIEC) second set of data requests.

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IV. OVERVIEW OF CILCO'S DST COST STUDY METHODOLOGY

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- Q. What are the primary bases of CILCO's proposed DST rates?
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- A. CILCO uses a 2000 test year and an embedded cost study. As noted above,
- CILCO allocates delivery services costs from FERC accounts to several
- distribution functional categories as well as to the current DST customer rate
- classifications. Based on these allocations, revenue requirement totals are
- developed for the various DST customer classes. In this manner, a revenue
- requirement for each DST customer class is linked to one or more of the
- 241 distribution functional categories.

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³ In Docket No. 01-0637, this revised amount appears in CILCO Exhibit 10.0, WPB-1e.

243		CILCO's cost study methodology relies heavily on allocating costs to rate classes
244		on the basis of voltage, determined from class non-coincident peaks (NCP) at
245		various points along the distribution system. By allocating costs in this manner,
246		CILCO seeks to implement DST charges that are based more on individual
247		usage characteristics. For example, larger customers under Rate N5
248		(subtransmission DST rate classification) are not allocated costs associated with
249		distribution transformers since these customers typically provide their own
250		transformation. Thus, CILCO's proposed DST rates are the result of allocating
251		costs and resulting revenue requirements on the basis of voltage characteristics,
252		NCP allocators, and distribution functional categories.
253		
254	Q.	Is CILCO's proposed cost of service study methodology the same as approved in
255		Docket Nos. 99-0119/99-0131, consolidated?
256	A.	Overall the methodologies are similar. However, some significant differences do
257		exist. These differences impact the final rate design and DST rate levels.
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259	Q.	Do you agree with CILCO's general cost study methodology?
260	A.	Yes. I agree with CILCO's general approach. However, while some of the
261		differences mentioned above are appropriate, others should not be accepted.
262		Both types of differences are discussed in my testimony. Based on the reasons
263		discussed in my testimony, I believe modifications to CILCO's cost study and
264		proposed rate design are needed to arrive at appropriate DST rates.

266	Q.	Is CILCO proposing significant of	changes to its existing DST rate classifications?	
267	A.	Yes. In addition to developing residential DST rates, CILCO is proposing all new		
268		non-residential DST rate classifications. CILCO proposes to replace current		
269		Rates 35-37 and Riders DST 1-3	3 with Rate RDS, Rate NDS, Rider MS, and other	
270		related riders. A comparison be	tween the current DST rate classifications and	
271		proposed Rates RDS and NDS	(as proposed in errata materials filed on	
272		November 9, 2001) is shown be	low:	
273		<u>Current</u>	Proposed	
274		Rates 1, 15	R1 (energy rate)	
275 276		Rate 2	R2 (demand rate < 1000 kw)	
277 278 279		Rates 22, 13-secondary <5kw	N1 (energy rate)	
280 281 282		Rates 21-secondary, 13-secondary >5kw	N2 (demand rate < 1000kw)	
283 284 285		Rates 21-secondary, 13-secondary >5kw	N3 (demand rate > 1000kw)	
286 287		Rates 21-primary, 13- primary	N4 (primary demand rate)	
288 289 290 291 292		Rates 21-subtransmission, 32- subtransmission, 13- subtransmission	N5 (subtransmission demand rate)	
293	Q.	Is CILCO proposing significant of	changes to existing DST rate levels?	
294	A.	Yes, significant changes are pro	posed for some DST rate classifications. For	
295		example, based on CILCO's Nov	vember 9th errata materials, CILCO proposes to	
296		increase selected rate levels as	follows:	
297		Rate	Proposed Increase	

\$4.71/kw to \$6.62/kw (41%)

13-secondary >5kw capacity charge

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299			customer charge	\$3.21/mon to \$7.88/mon (146%)
300		21-secondary	capacity charge	\$4.58/kw to \$5.49/kw (20%)
301		21-primary	capacity charge	\$4.03/kw to \$4.23/kw (5%)
302				
303 304	V.	FUNCTIONAL ALL	OCATION	
305	Q.	What is the total re-	venue requirement p	roposed by CILCO, based on distribution
306		delivery services to	tals by FERC accou	nt?
307	A.	CILCO's cost study	proposes a delivery	services revenue requirement of
308		approximately \$112	2,057,000 (as explair	ned in CILCO's response to Staff data
309		request DLS-11; At	tachment 1 to my tes	stimony). This proposed revenue
310		requirement compa	res to \$89,700,000 a	approved in Order No. 99-0119/99-0131,
311		consolidated.		
312				
313	Q.	Please describe CI	LCO's functional allo	cation study.
314	A.	CILCO's functional	allocation study assi	gns delivery services cost totals from
315		each FERC accour	nt simultaneously to s	several functional categories related to
316		distribution and to [OST rate classes.	
317				
318	Q.	Please discuss how	v CILCO's cost study	allocates the electric distribution delivery
319		services cost totals	by FERC account a	cross distribution functional categories
320		and DST rate class	es.	

321	A.	For each FERC account, CILCO's cost study allocates costs among			
322		subcategories of three general distribution-related functional categories			
323		designated as capacity, meter, and customer, as follows:			
324		<u>Capacity</u>	<u>Meter</u>	Customer	
325		Subtransmission	second-single ph	meter reading	
326		subtransmission-subst	secondary	customer records	
327		direct assignment-subst	primary	uncollectables	
328		primary substations	primary-substation	customer assistance	
329		primary	subtransmission	customer information	
330		secondary	transmission	customer black start	
331		load dispatching meter regulatory obligation		meter regulatory obligation	
332		additional facilities instrument transformer			
333		distribution transformers customer services		customer services	
334				lighting	
335		customer advances			
336		deposits			
337		late payment			
338					
339		CILCO uses direct assignr	ment and internally d	eveloped allocators to assign	
340		costs to the distribution fur	nctional categories.		
341					
342	Q.	Have sales expenses been	n properly excluded	from distribution?	
343	A.	Yes. In CILCO's cost of se	ervice study, no distr	ibution sales expense is included	
344		in FERC accounts 911-910	6.		
345					

346	Q.	In regard to CILCO's proposed allocation of delivery services costs to distribution
347		functional categories in this Docket and the methodology approved in Docket
348		Nos. 99-0119/99-0131, consolidated, are there differences that impact the final
349		DST rates?
350	A.	Yes. Based on my review of these differences, I identified six that have a
351		significant impact on final DST rates.
352		
353	Q.	Please discuss these significant differences and their associated impact on final
354		DST rates.
355	A.	The first significant difference that I reviewed related to FERC accounts 360-362.
356		These accounts show substantial increases in subtransmission costs due to the
357		results of Docket No. 01-0465. I believe that this difference is appropriate based
358		on the costs that were reassigned from primary to subtransmission in that
359		Docket.
360		
361		The second significant difference relates to costs in FERC account 368. Costs in
362		this account are now split between the primary and secondary distribution
363		functional categories. In the previous non-residential DST proceeding, the costs
364		were split between line transformers and direct assignment. In my view, the
365		proposed split is an acceptable change that helps to better define FERC account
366		368 costs on the basis of voltage.
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The third significant change that I reviewed relates to FERC account 369, Services. Costs in this account were allocated to demand distribution services in 1999, which ultimately were recovered in DST usage charges. In the current proceeding, CILCO proposes to allocate FERC account 369 costs to customer services and recover the associated revenue requirement in DST access charges. This proposed change results in increased customer charges, in the form of a proposed service access charge for all DST rate classifications except Rates N4 and N5. Based on the study provided by CILCO that depicts how FERC account 369 costs are allocated, I believe that it is appropriate to recover customer services costs through customer charges rather than usage charges.

A fourth significant difference is related to FERC account 370. In 1999, these costs were allocated entirely to meters. Now, in addition to meters, CILCO has assigned FERC account 370 costs to new subcategories of "customer meter regulatory obligation" (cmro) and "instrument transformer". CILCO defines cmro as "... the costs related to the investments remaining on the records of the Company, for customers where their meter has been removed, as it relates to providing meter services." (CILCO response to Staff data request DLS-13; Attachment 2 to my testimony) I interpret CILCO's definition to mean that the Company intends to use the FERC account 370 subcategory of cmro to recover costs related to equipment that will no longer be used. CILCO further states, "When the Company removes its meter from a customer's premises, the capitalized costs for installation remains on the Company's books until the meter

is retired." (CILCO response to Staff data request DLS-14; Attachment 3 to my testimony) Presumably, CILCO is choosing to keep this unused equipment under the pretext that the equipment might be needed in the future if a customer returns to CILCO from DST rates. The issue of whether such costs should be recovered must be decided outside this proceeding in light of the fact that CILCO's FERC Form 1 information related to FERC account 370 is fixed. However, for purposes of establishing DST rates and charges, I do not agree that such costs should be recovered from all customers through the DST customer charge, as proposed by CILCO. In essence, CILCO's use of the cmro distribution functional category increases customer charges and lowers meter service charges. Instead, I believe that cmro costs should be allocated either to meters in general or to other meter-related distribution functional categories. However, in lieu of making such an adjustment at the functionalization stage of the cost study, I recommend revisions to CILCO's rate design proposals, as discussed in the rate design section of my testimony (in relation to my first recommended rate design revision).

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The fifth significant difference relates to FERC accounts 580-598. Costs in these accounts were allocated to demand distribution services in 1999, and ultimately were recovered in DST usage charges. Now, CILCO proposes to allocate FERC accounts 580, 586-590, and 597-598 to a combination of meters, cmro, and customer services distribution functional categories. The ultimate result is increased customer and access charges and lower usage charges. I do not

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believe that such costs should be recovered in customer charges. However, In lieu of making an adjustment at the functionalization stage of the cost study, I recommend revisions to CILCO's rate design proposals, as discussed in the rate design section of my testimony (as part of my first recommended rate design revision).

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The sixth significant difference relates to FERC accounts 920-935 (administrative and general or A & G accounts). For the same reasons mentioned previously in regard to allocating general plant costs to distribution, I do not believe that costs in the A & G accounts are properly allocated to DST rate classifications, because CILCO used allocator AF2 to determine the distribution amounts for these accounts. The AF2 allocator does not include electric generation and therefore does not conform to the methodology approved in CILCO's 1999 DST docket for allocating A & G accounts to distribution. In that docket, A & G accounts were allocated to distribution on the basis of a labor allocator that included electric generation, transmission and distribution. Therefore, I recommend using CILCO allocator AF1 to allocate A & G FERC accounts to distribution, prior to allocating costs to DST rate classifications. Allocator AF1 includes electric generation, transmission, and distribution. However, due to the late receipt of clarifying information contained in CILCO's responses to IIEC's second set of data requests, revisions to CILCO's cost study reflecting the use of allocator AF1 will be addressed in my rebuttal testimony.

437	Q.	Please summarize your conclusions and recommendations regarding revisions to		
438		CILCO's fu	nctional allocation of electric distribution delivery services totals by	
439		FERC acco	unt.	
440	A.	My conclus	ions and recommendations related to CILCO's proposed functional	
441		allocation a	re as follows:	
442		1.	FERC accounts 360-362 and 368 are appropriately allocated.	
443		2.	The allocation of FERC account 369 is appropriate.	
444		3.	The allocations of FERC accounts 370, 580, 586-590, and 597-598	
445			are not appropriate and are addressed in my recommended rate	
446			design revisions.	
447		4.	The allocations for FERC accounts 920-935 are not appropriate,	
448			and will be addressed in rebuttal testimony, pending further review	
449			of CILCO's responses to IIEC's second set of data responses.	
450 451	VII.	RATE DES	IGN	
452 453		A. Des	cription	
454	Q.	Please des	cribe CILCO's methodology for developing revenue requirements for	
455		DST custor	ner classes.	
456	A.	Based on th	ne costs assigned to distribution functional categories and to existing	
457		DST rate cl	assifications, a revenue requirement is developed for each current	
458		DST rate cl	assification. Subsequently, final revenue requirements are created	
459		for each pro	pposed DST rate classification. In addition, CILCO unbundles	
460		residential	metering, as recommended by Staff in all the current DST dockets	

461		
462	Q.	Did CILCO submit a different rate design proposal subsequent to its October 3,
463		2001 filing?
464	A.	Yes. CILCO submitted errata materials on November 9, 2001, that altered the
465		original DST rate classifications and significantly changed rate design proposals
466		filed on October 3, 2001.
467		
468	Q.	Please describe CILCO's proposed new DST rate classifications, as submitted
469		on November 9th, that are based on combinations of existing DST rate
470		classifications.
471	A.	In my view, the proposed combinations accurately reflect common
472		characteristics, based primarily on voltage similarities. For example, while
473		proposed DST Rate R1 is comprised of current DST Rates 1 and 15, and
474		proposed DST Rate N1 consists of a combination of current Rates 13-secondary
475		< 5kw and 22, CILCO adds revenue requirements for all four current DST rates
476		to calculate the same customer, energy and access charges for proposed DST
477		Rates R1 and N1. A similar combination process is used to develop charges for
478		proposed DST Rates R2, N2, and N3.
479		
480	Q.	Please describe CILCO's overall rate design.
481	A.	DST charges proposed by CILCO include Customer Charges, Distribution
482		Capacity Reservation (demand and energy) Charges, Service Access Charges,

483		Facilities Charges (Rates N4 and N5 customers only), and Meter Service							
484		charges.							
485									
486	Q.	Please describe the rate design components of each of these charges.							
487	A.	As originally proposed by CILCO, the rate design components of each of the							
488		proposed DST charges are as follows:							
489 490 491 492 493 494		Customer Charge: customer records and collection uncollectable accounts customer assistance information and instruction customer black start customer meter regulatory obligation							
495 496 497 498 499 500 501 502 503		Capacity Charge: Demand Distribution Components: subtransmission substation primary substation distribution primary distribution secondary load dispatching distribution transformers							
504 505 506		Service Access Charge: customer services							
507 508		Facilities Charge: distribution transformers (Rate N4) direct assignment substations (Rate N5)							
509 510 511 512 513		Meter Service Charge: meters meter reading cust. meters instrument transformers							
514		CILCO's November 9th filing divides the rate design components of cmro,							
515		meters, and meter reading between customer and meter service charges instead							
516		of assigning the entire revenue requirement for a component to either the							
517		customer charge or the meter service charge.							

518	3
-----	---

Q. Have "Other Revenues" been excluded prior to calculating customer and usage
 charges?
 A. Yes. Based on CILCO WPC-11, operating revenues of \$109,190,900 are

Yes. Based on CILCO WPC-11, operating revenues of \$109,190,900 are calculated. Other revenues of \$855,000 are deducted from this amount prior to establishing operating revenues of \$108,335,000 based on CILCO's current rate of return of 9.09%. The operating revenues, excluding other revenues, are then increased to reflect CILCO's requested rate of return in this proceeding of 9.84%. This results in a requested revenue requirement of \$112, 057,000, from which wholesale related revenues of \$129,200 are deducted prior to calculating CILCO's final retail DST rates.

529

530

B. Recommendations

- 531 Q. Are you recommending revisions to CILCO's proposed DST rate design?
- 532 A. Yes. I am recommending four revisions to CILCO's proposed rate design, as submitted on November 9th.

534

- Q. What is your first recommended revision to CILCO's proposed DST rate design?
- A. As discussed previously, I disagree with CILCO's proposal to assign recovery of a portion of revenue requirements for the meters and cmro distribution functional categories (derived from FERC account 370) to customer charges. Instead, I recommend that the cmro-related revenue requirements be recovered through meter service charges, as approved in CILCO's 1999 DST docket and further

articulated in Commission Order No. 99-0013 (meter unbundling). As shown in Schedule 3 to my testimony, this recommendation can be accomplished by calculating customer charges excluding meters and cmro. Schedule 4 shows the result of calculating meter service rates after adding the revenue requirements associated with meters and cmro.⁴ The impact of this recommendation is lower customer charges and increased meter service charges, which translates into more savings for customers that choose an alternative meter service provider (MSP).

This recommendation also addresses my disagreement with CILCO's proposed allocation of FERC accounts 580, 586-590, and 597-598, discussed earlier under Functionalization. My recommendation to recover costs associated with crmo from meter service charges serves to switch cost recovery for these accounts from customer charges to meter service charges.

- Q. What is your second recommended revision to CILCO's proposed DST rate design?
- 558 A. CILCO proposes to recover a portion of revenue requirements related to meter 559 reading through customer charges, although in the October 3rd filing, CILCO 560 proposed recovery entirely through meter service charges. As in the case of 561 cmro, I recommend that these revenue requirements be recovered through meter

⁴ Both Schedules 3 and 4 are revised worksheets based on original materials provided by CILCO.

562		service charges, as shown in Schedules 3 and 4. This recommendation is also
563		in line with Commission Order No. 99-0013.
564		
565	Q.	What is your third recommended revision to CILCO's proposed DST rate design?
566	A.	CILCO proposes the following combinations of rates and charges:
567		*Same customer, access and energy charges for Rates R1 and N1
568		*Same customer charge for Rates R2, N2, and N3
569		*Same access and demand charges for Rates R2 and N2
570		I recommend individual customer, access and usage charges for Rates R1, R2,
571		N1, N2, and N3. My recommended adjustments are shown in Schedule 3. As
572		shown in Schedule 3, I calculated individual charges for each DST rate
573		classification, including my recommendations related to customer and meter
574		service charges discussed above.
575		
576	Q.	What is your fourth recommended revision to CILCO's proposed DST rate
577		design?
578	A.	I recommend adding text to Rider MS to clarify how the various meter
579		configurations in Rider MS apply to DST rate classifications. Such language
580		would explain the typical metering configuration that applies to a particular DST
581		rate classification. Additional text should also be provided to indicate that
582		customers that do not use the typical meter configuration must pay the
583		appropriate meter service charges, according to metering type. Schedule 5

shows my recommended additional text. My recommended language would replace CILCO's proposed text, submitted on November 9th.

Q.

Α.

Have you identified other issues related to CILCO's proposed DST rate design?

Yes. Meter service charges are listed in Rider MS using two columns. The first column lists meter charges for customers choosing CILCO as the MSP. The second column lists charges for customers choosing an alternative MSP. Both columns indicate charges associated with specific types of metering configurations. There is potential confusion regarding what the two columns represent in terms of why a customer would continue to pay meter service charges to CILCO, even if the customer chooses an alternative MSP. In fact, CILCO appears to be the only Illinois electric utility to depict meter service charges in this manner.

As a first step in addressing this issue, definitions of the two columns must be noted. The first column represents the costs that CILCO incurs for serving as an MSP. The second column represents the instrument transformer costs that CILCO believes must be paid by customers using an alternative MSP, but still requiring instrument transformer metering. Customers that do not require instrument transformer metering would not pay charges in the second column if an alternative MSP is selected. The question arises as to whether two columns of meter service charges are necessary. Although potentially confusing, I do not recommend eliminating the second (MSP) column at this time. If the second

607		column was	eliminated, instrument transformer metering costs incurred by
608		CILCO would	d need to be recovered in another manner, such as through the
609		customer ch	arge. Based on discussions with CILCO staff, it is the Company's
610		position that	if the MSP column is eliminated, customer charges would need to
611		be increased	and spread over all customers, regardless of their use of instrument
612		transformation	on.
613			
614	Q.	Please sumr	marize your recommendations related to CILCO's proposed DST rate
615		design.	
616	A.	My rate desi	gn recommendations can be summarized as follows:
617		1.	Revenue requirements associated with both meters and cmro
618			(derived from FERC account 370) should be recovered through
619			meter service charges.
620		2.	Revenue requirements related to meter reading should be
621			recovered through meter service charges.
622		3.	Individual customer charges should be developed for Rates R1, R2,
623			and N1.
624		4.	Individual access charges and usage charges should be developed
625			for Rates R1, R2, N1, and N2.
626		5.	Additional text should be included in Rider MS to explain how the
627			various meter service charges apply to DST rate classifications.
628			Additional text should also be provided to indicate that customers

that do not use the typical meter configuration must pay the
appropriate meter service charges, according to metering type.

VIII. CONCLUSIONS

Q. Please summarize the results of your recommendations.

A. My recommendations for modifications to CILCO's proposals in Docket Nos. 01-0465 and 01-0637 result in the following DST rates and charges, as shown in Schedules 3 and 4. The rates and charges do not include possible adjustments to the Company's revenue requirements from other Staff witnesses. The rates and charges also do not include revisions to CILCO's cost study to reflect my recommendation to use a different allocator for allocating general plant and FERC accounts 920-935 to distribution. Pending further review of CILCO's clarifying responses to IIEC's second set of data requests, received on November 27, 2001, additional Staff adjustments and the appropriate allocator for general plant and FERC accounts 920-935, along with resulting changes in Staff's recommended revenue requirement, will be addressed in my rebuttal testimony.

Delivery Services Rates

64	9	Rate	<u>e</u>	Staff Re	<u>commen</u>	<u>ded</u>	<u>C</u>	LCO Pro	posed	
65 65 65 65	1 2 3	(Nov	ember 9, 20 <u>Customer</u> (\$/month) \$693.63	,	Serv. Acc (\$/acc. pt.		Customer (\$/month) \$825.10	Dist. Cap. (\$/kw) \$0.54	Serv. Acc. (\$/acc.pt.)	
65	5	N4	10.87	4.23	NA	0.52	14.50	4.23	NA	0.52
65	6	N3	5.41	5.49	106.94	NA	7.88	5.49	106.94	NA

657		N2	5.41	6.67	2.32	NA	7.88	6.62	2.30	NA			
658		N1	4.82	0.0292/kwh	2.31	NA	5.67	0.0222/kwh	2.66	NA			
659		R2	5.07	4.30	1.86	NA	7.88	6.62	2.30	NA			
660		R1	4.23	0.0219/kwh	2.68	NA	5.67	0.0222/kwh	2.66	NA			
661	Mont	hly Me	ter Ser	vice Charg	es								
662 663 664 665 666	Staff Recommended CILCO Proposed CILCO MSP CILCO MSP Non-Transformer-Rated Metering												
667				Phase \$2.65		\$0.00		\$ 1.43		\$ 0.00			
668 669			Three F	hase 9.61 Tree Ph 7.61		0.00 0.00		5.1 ² 4.0		0.00 0.00			
670	IXW IV	icter of	ingic/ in			0.00		7.00	J	0.00			
671 672	Trans	sforme	r-Rate	d Metering -	- Non-	Interval							
672 673	Kw T	OU Me	ter-S/T	Ph \$17.2	1	\$7.84		\$ 12.8	3	\$ 7.84			
674	Kw N	leter-Th	nree Ph	ase 17.9	0	8.43		13.4	7	8.43			
675	Kw M	leter-Th	nree Ph	480v 24.9		15.35		20.4		15.35			
676	Kw M	leter-Pi	rimary	125.7	'5	116.13		121.2	5	116.13			
677													
678 679	Transformer-Rated Metering - Interval												
680	Mete	r-Secor	ndary	\$118	3.51	\$14.52		\$ 70.5	58	\$ 14.52			
681	Mete	r 5kv –	Primar	y 202	.86	100.86		172.8	30	100.86			
682			– Prima	•	.97	153.64		219.9	91	153.64			
683 684	Mete		v or 69l		62	534.61		606.5	-7	E24 61			
685	Mete	r 138kv	ansmis ′ –	sion 636	.03	334.01		000.3) <i>(</i>	534.61			
686 687			smissio	n 1435	5.28	1331.35		1435.2	28	1331.35			
688	Q.	If the	Comm	ission appro	ves a [OST revenu	ıe requ	irement that	is dif	ferent fror	n the		
689		one u	sed in	your analyse	es, how	should the	e DST r	ates as sho	wn in	your			
690		Sche	dules 3	and 4 be m	odified	?							
691	A.	The D	OST rat	es recomme	nded i	n my Sched	dules 3	and 4 shoul	d be	adjusted			
692		acros	s the b	oard based	on the	percentage	differe	ence betwee	n the	revenue			

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693		requirement used in my analyses and the revenue requirement approved by the
694		Commission.
695		
696	Q.	Does this conclude your testimony?
697	Δ	Yes

9170000

7528800 8124593 9110000

9240000

9550000 9700000

9850000

9890000

9910000

9920000

Grand Total

\$29,308,242.47 \$754,226.97 \$11,115,728.93 \$12,697,115.44

\$50,168.40 \$763,449.59 \$917,868.75

\$4,932.98 \$55,611,733.53

9980000

			7528800	8124593	9110000	9170000	9190000	9200000	9210000	9240000	9550000	9700000	9850000	9890000	9910000	9920000	9980000	1
		olt 5	Atlanta	Philo	Mainframe -	Downtn Off Liberty	Information	Harrison Street	Liberty Street	310 Liberty St.	Morton Serv	Eastern Service		Lincoln Service	Homer-Service		General Plant**	1
		oit o	rtiarita	1 11110				Area		0 10 Liberty Ot.		Center	Service Center	Center		Buildings	Non Location *	1
					Communication	St	Systems Center-	Area	Parking Lot		Bldg	Center	Service Ceriler	Center	Center	Buildings	Non Location	۱
ICC Acct					Equi		Bar											1
1 303	3	34700															\$29,308,242.47	1
2 389)	34701				\$325,110.00	\$40,720,23	\$48,418,58	\$41,217.00	\$55,661.59		\$127,631,49	\$30,721,94	\$30,204.24	\$54.541.90			1
3 390		34702	\$6,588.91	\$5,539.49		\$5,404,704.34	\$748,935.46	\$475,429.56	\$180,287.35	\$49,760.04	\$4,879.73		\$1,351,306.46	\$993,634.89				1
			φ0,300.31	ψυ,υυυ.+υ			ψ140,333.40	φ+10,420.00	\$100,207.33	\$49,700.04	94,013.13	\$1,730,403.70	\$1,551,500.40	φ333,034.03	\$121,100.10	ψ0,330.70		1
4 391		34703			\$2,213.74	\$222,033.78											\$12,472,867.92	1
5 393	3	34705															\$50,168.40	1
6 394		34706															\$763,449.59	1
7 397		34709																۱
																	\$917,868.75	
8 398		34710															\$4,932.98	
9		Grand Total	\$6,588.91	\$5,539.49	\$2,213.74	\$5,951,848.12	\$789,655.69	\$523,848.14	\$221,504.35	\$105,421.63	\$4,879.73	\$1,886,117.25	\$1,382,028.40	\$1,023,839.13	\$181,722.06	\$8,996.78	\$43,517,530.11	ſ
10																*	-	-
11										93%								
	•	0.1		B		O Di	0.4		•		F1 T 70/	O						
12 <u>ICC A</u>		Cilco Acct		Description		Gross Plant	Codes	<u>Generation</u>	<u>Gas</u>	El Distr 93%	El Trans 7%	Grand Total						
3 303	3	34700	9980000	Gen Plt Exc	cluding CIS System	\$15,569,692.35	В		\$7,784,846.18	\$7,239,906.94	\$544,939.23	\$15,569,692.35						
4 Intangi	ible		9980000	Customer/1	CIS System	\$13,738,550.12	D		\$6,869,275.06	\$6,869,275.06	\$0.00	\$13,738,550.12						
5				Unclassified		\$3,430,912.81		\$330,912.81	\$558,000.00		\$2,186,120.00							
			0.120000					φ330,912.01					-					
16 389		34701	9170000	Downtn Of		\$325,110.00			\$162,555.00	\$151,176.15	\$11,378.85	\$325,110.00						
17 Land	d		9190000	Information	Systems Center	\$40,720.23	В		\$20,360.12	\$18,934.91	\$1,425.20	\$40,720.23						
18			9200000	Harrison Str		\$48,418.58			\$24,209.29	\$22,514.64	\$1,694.65	\$48,418.58						
9			9210000		et Parking Lot	\$41,217.00			\$20,608.50	\$19,165.91	\$1,442.59	\$41,217.00						
0			9240000	310 Liberty	St.	\$55,661.59	В		\$27,830.80	\$25,882.64	\$1,948.15	\$55,661.59						
1			9700000	Eastern Ser	rvice Center	\$127,631.49	C			\$118,697.29	\$8,934.20	\$127,631.49						
22			9850000		Service Center	\$30,721.94			\$15,360,97	\$14,285.70	\$1,075.27	\$30,721.94						
23			9890000	Lincoln Sen		\$30,204.24			\$15,102.12	\$14,044.97	\$1,057.15	\$30,204.24						
4			9910000	Homer-Serv	vice Center	\$54,541.90	В		\$27,270.95	\$25,361.98	\$1,908.97	\$54,541.90						
5 390)	34702	7528800	Atlanta		\$6,588.91	A			\$6,588.91		\$6,588.91						
6 Structu			8124593	Philo		\$5,539.49				\$5,539.49		\$5,539.49						
	nes												-					
27			9170000	Downtn Of		\$5,404,704.34			\$2,702,352.17	\$2,513,187.52	\$189,164.65							
28			9190000	Information	Systems Center	\$748,935.46	В		\$374,467.73	\$348,254.99	\$26,212.74	\$748,935.46						
9			9200000	Harrison Str	reet Area	\$475,429.56	B		\$237,714.78	\$221,074.75	\$16,640.03	\$475,429.56						
)			9210000			\$180,287.35			\$90.143.68	\$83,833.62	\$6,310.05	\$180,287.35						
					et Parking Lot													
1			9240000	310 Liberty		\$49,760.04			\$24,880.02	\$23,138.42	\$1,741.60	\$49,760.04						
2			9550000	Morton Serv	v Bldg	\$4,879.73	E			\$4,879.73		\$4,879.73						
3			9700000	Eastern Ser		\$1,758,485.76	C			\$1,635,391.76	\$123 094 00	\$1,758,485.76						
4			9850000		Service Center	\$1,351,306.46			6675 653 33	\$628,357.50	\$47,295.73							
									\$675,653.23									
35			9890000	Lincoln Sen	vice Center	\$993,634.89	В		\$496,817.45	\$462,040.22	\$34,777.22	\$993,634.89						
36			9910000	Homer-Serv	vice Center	\$127,180.16	В		\$63,590.08	\$59,138.77	\$4,451.31	\$127,180.16						
37			9920000	Tuscola Off	ice Buildings	\$8,996.78	B		\$4,498.39	\$4,183.50	\$314.89	\$8,996.78						
38			002000	Unclassified		\$557,106.32			\$278,553.16	\$259,054.44	\$19,498.72	\$557,106.32						
39 391			9110000		Communication Eq	\$2,213.74			\$1,106.87	\$1,029.39	\$77.48	\$2,213.74	_					
0 Office	Eq		9170000	Downtn Of	f Liberty St	\$222,033.78	В		\$111,016.89	\$103,245.71	\$7,771.18	\$222,033.78	İ					
1			9980000		nt** Non Location *	\$12,472,867.92	R		\$6,236,433.96	\$5,799,883.58	\$436,550,38	\$12,472,867.92	-					
				Unclassified		\$8,026,106.21		\$866,753.73	\$2,828,671.82		\$1,675,171.54							
2								φουυ,/ 53./ 3										
393 Sto			9980000		nt** Non Location *	\$50,168.40			\$25,084.20	\$23,328.31	\$1,755.89	\$50,168.40						
14 394	ŀ	34706	9980000	General Pla	nt** Non Location *	\$763,449.59	В		\$381,724.80	\$355,004.06	\$26,720.73	\$763,449.59						
45 Tools,Ga	arage			Unclassified	d Plant		See WP A-9		\$9,375.41	\$8,719.13	\$656.28	\$18,750.82						
46 397 Cor		24700	9980000		int** Non Location *	\$917,868.75			\$458,934,38	\$426,808.97	\$32,125.40	\$917,868.75						
47 398 Mis	ic Eq	34/10	9980000	General Pla	nt** Non Location *	\$4,932.98	В		\$2,466.49	\$2,293.84	\$172.65	\$4,932.98	_					
8						\$67,644,609.69		\$1,197,666.54	\$30,528,904.50	\$30,505,611.92	\$5,412,426.73	\$67,644,609.69						
							•						•					
19																		
50	_	٩	34.5 Distrib										_					
51		В	Common F	Plant allocated	d 50-50 between elec	tric and gas based o	n customers, Elect	ric portion split ba	sed on net plant %	for Distribution & Tr	ansmission bas	ed on plant						
52		C	Fastern Se	rvice Center	(all electric) - Allocate	ed between distribution	on and transmission	n based on net ni	ant .				•					
53		Ď			tware \$6,869,275.0					allocated to transmi	noion							
								nei inionnauon o	sterri does not get	allocated to transmi	551011							
54		E	Old Mortor	Service Cer	nter next to distribution	n Central Substation,	used for storage.											
55																		
		Notes:	The Comp	any has reorg	ganized into separate	husiness units at ser	narate facilities. Th	e production arou	n has taken resnon	sibility for cornorate	functions that							
		10103.																
					ned at the General Of	lice (9170000) and tr	iey nave installed t	nen own general I	eugers, payroil, acc	counts payable, and	iriventory							
56			systems at	the power pl	ants.													
			-		nts corporate softwar	e used by Electric on	d nas T&D unite fo	r inventory acces	inte navahla ganor	al ledger, and hudar	ating which are							
					ctric and gas based o	n customers. The ele	ectric portion is spl	it based on net pla	ant % for I&D. Billi	ng system electric p	ortion all							
57			distribution	, see code D	above.													
//																		

9200000

9210000

9190000

CENTRAL ILLINOIS LIGHT COMPANY Electric General and Common Plant Comparison ICC Staff Exhibit 6.0 Schedule 2

ICC			
ACCOUNT			Increase
NUMBER	1997 Amount	2000 Amount	(Decrease)
GENERAL PLANT			
389 Land	104,872.58	95,546.00	(9,326.58)
390 Structures	6,029,062.79	6,039,426.07	10,363.28
391 Office Equip	1,038,106.81	1,479,610.11	441,503.30
392 Tranportation Eq	3,420,320.02	3,603,607.98	183,287.96
393 Stores Equip	119,525.62	105,510.62	(14,015.00)
394 Tools, Shop, & Garage Eq	2,348,385.63	2,651,326.86	302,941.23
395 Lab Equip	1,245,926.09	1,126,124.82	(119,801.27)
396 Power Operated Equip	9,449,036.69	10,417,094.46	968,057.77
397 Communication Equip	181,707.26	210,716.96	29,009.70
398 Miscellaneous Equip	1,729.06	1,729.06	0.00
TOTAL GENERAL PLANT	23,938,672.55	25,730,692.94	1,792,020.39
Portion assigned to Distribution	19,652,948.77	21,965,164.72	
% assigned to Distribution	82%	85%	
COMMON PLANT			
303 Miscellaneous Intangible	14,511,723.80	32,739,155.28	18,227,431.48
389 Land	929,599.40	754,226.97	(175,372.43)
390 Structures	15,857,082.16	11,672,835.25	(4,184,246.91)
391 Office Equip	8,801,459.55	20,723,221.65	11,921,762.10
393 Stores Equip	61,747.82	50,168.40	(11,579.42)
394 Tools, Shop, & Garage Eq	565,520.34	782,200.41	216,680.07
397 Communication Equip	921,728.49	917,868.75	(3,859.74)
398 Miscellaneous Equip	4,932.98	4,932.98	0.00
TOTAL COMMON PLANT	41,653,794.54	67,644,609.69	25,990,815.15
Portion assigned to Distribution	16 204 102 40	20 505 611 02	
e	16,284,183.40	30,505,611.92	
% assigned to Distribution	39%	45%	
Total Electric General & Common	65,592,467.09	93,375,302.63	
Portion assigned to Distribution		52,470,776.64	
% assigned to Distribution	35,937,132.17	52,470,776.64 56%	
70 assigned to Distribution	55%	30%	

FINAL

16-Nov-01

KWH RATE - R1 AND N1

		LIMITED OFF PEAK SEC RATE 22 DST (14)-3	RESIDENTIAL RATE 1 DST (2)	WATER HEATING RATE 15 DST (5)	GENERAL SERV SECOND RATE 13 DST			
	CLAIMED RATE OF RETURN SUMMARY SCHEDULE - COM		.,	,				
	RATE OF RETURN	9.84%	9.84%	9.84%	9.84%		DEVELOPME	NT OF RATE
	REVENUES REQUIRED					ļ	CUSTOMER	ENERGY
1	DEMAND COMPONENTS	\$36,329	\$39,673,801	\$95				
2	DEMAND PRODUCTION DEMAND TRANSMISSION	\$0 \$0	\$0 \$0	\$0 \$0				
4	DEMAND TRANSMISSION OTHER	\$0 \$0	\$0 \$0	\$0 \$0				
5	DEMAND TRANSM LOAD DISPATCHING	\$0	\$0	\$0				
6 7	DEMAND DISTRIBUTION DEMAND SUBTRANSMISSION	\$36,329 \$2,163	\$39,673,801 \$2,952,941	\$95 \$9	\$1,804,684 \$134,883			3,089,995
8	DEMAND SUBTRANSMISSION DEMAND SUBTRANSM SUBSTATIONS	\$1,587	\$2,005,411	\$6	\$91,602			2,098,607
9	DEMAND DIRECT ASSIGN SUBSTATIONS	\$0	\$0	\$0	\$0			0
10 11	DEMAND DISTR PRIMARY SUBSTATIONS DEMAND DISTRIBUTION PRIMARY	\$3,266 \$7,989	\$4,127,131 \$17,783,252	\$13 \$32	\$188,517 \$812,295			4,318,927 18,603,568
12	DEMAND DISTRIBUTION SECONDARY	\$0	\$7,891,101	\$18	\$360,446			8,251,565
13 14	DEMAND DISTRIB LOAD DISPATCHING DEMAND DISTRIB ADD'L FACILITIES REV	\$900 \$0	\$449,905 \$0	\$4 \$0	\$13,032			463,841 0
15	DEMAND DISTRIBUTION TRANSFORMERS	\$20,423	\$4,464,061	\$14	\$0 \$203,909			4,688,407
16	DEMAND DISTRIBUTION SERVICES	\$0	\$0	\$0	\$0			
17	ENERGY COMPONENTS	\$0 \$00.240	\$0	\$0	\$0			
18 19	CUSTOMER COMPONENTS 370 - METERS SINGLE PHASE SEC - Cust Chrg	\$66,210 \$70	\$20,065,405 \$611,067	\$1,248 \$251	\$0 \$53,703		665,092	
	371 - METERS SINGLE PHASE SEC - MS Rider	\$84	\$689,500	\$278	\$60,524			
20	370 - METERS SECONDARY - Cust Chrg	\$4,450 \$4,006	\$66,410 \$74,035	\$0 \$0	\$18,235		89,095	
21	371 - METERS SECONDARY - MS Rider 370 - METERS PRIMARY - Cust Chrg	\$4,996 \$0	\$74,935 \$0	\$0 \$0	\$20,551 \$0		0	
	371 - METERS PRIMARY - MS Rider	\$0	\$0	\$0	\$0		_	
22	370 - METERS PRIMARY SUBSTATION - Cust Chrg 371 - METERS PRIMARY SUBSTATION - MS Rider	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0		0	
23	370 - METERS SUBTRANSMISSION - Cust Chrg	\$0 \$0	\$0 \$0	\$0	\$0		0	
	371 - METERS SUBTRANSMISSION - MS Rider	\$0	\$0	\$0	\$0			
24	370 - METERS TRANSMISSION - Cust Chrg 371 - METERS TRANSMISSION - MS Rider	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0		0	
25	902 - METER READING - Cust Chrg	\$1,413	\$1,133,120	\$10	\$37,804		1,172,348	
200	903 - METER READING - MS Rider	\$1,692	\$1,365,054	\$12	\$45,503		7.004.450	
26 27	903 - CUST RECORDS & COLL 904 - UNCOLLECTIBLE ACCOUNTS	\$6,678 \$0	\$6,829,727 \$215,353	\$311 \$0	\$227,735 \$4,466		7,064,450 219,819	
28	908 - CUSTOMER ASSISTANCE	\$2,284	\$1,845,459	\$66	\$105,196		1,953,005	
29 30	909 - INFORMATION & INSTRUCT CUSTOMER BLACK START	\$0 \$49	\$0 \$24,321	\$0 \$0	\$0 \$3,076		0 27,445	
31	CUST MTR REG OBLIG - Customer Charge	\$2,528	\$1,119,209	\$157	\$60,540		1,182,433	
	CUST MTR REG OBLIG - MS Rider	\$2,838	\$1,262,871	\$175	\$68,230			
32 33	CUST METERS INSTR TRANSF CUST SERVICES	\$34,978 \$4,501	\$59,090 \$5,645,974	\$0 \$0	\$0 \$163,071			
34	373 - STR LIGHT & OUTDOOR LIGHT	\$0	\$0	\$0	\$0		0	
35	CUSTOMER ADVANCES FOR CONSTR	\$0	(\$603,001)	\$0	-\$6,302			(609,303)
36 37	CUSTOMER DEPOSITS 450 - LATE PAYMENT CHARGES	\$0 (\$350)	(\$4,407) (\$269,277)	\$0 -\$12	-\$91 -\$2,732			(4,499) (272,371)
38		, ,		*				(=:=,=::)
39	TOTAL COMPANY	\$102,539	\$59,739,206	\$1,343	\$2,664,192		\$12,373,687	\$40,628,737
40	ANNUAL BOOKED KWH SALES	3,543,882	1,769,099,603	14,140	\$0 59,260,097			1,831,917,722
41	TOTAL ANNUAL BILLS	2,064	2,108,976	96	70,392		2,181,528	1,000,000,000
42 43	MONTHLY BILLING DEMANDS	CO 040	\$0.044.0F0	6077	6240.470			
	CUSTOMER CHARGE and DELIVERY	\$9,010 \$4.366	\$8,914,859 \$4.227	\$377 \$3.928	\$340,472 \$4.837		\$5.672	\$ 0.0222
		R1 Customer Char:		N1 Customer Char	\$4.823	·	,	
45	MONTHLY ACCESS CHARGE	Services:	\$5,813,546				\$2.66	
		R1 Service Charge:	\$2.677					
		N1 Service Charge:	\$2.313				\$/BILL/MONTH	CENTS/KWH Energy Charge:
							R ²	
	Meter Services Rider Revenue Requirements:					Total		\$0.0219
	371 - METERS SINGLE PHASE SEC - MS Rider	154	1,300,567	529	114,227	1,415,477	N'	
	371 - METERS SECONDARY - MS Rider 371 - METERS PRIMARY - MS Rider	9,446 0	141,345 0	0	38,787 0	189,577 0		\$0.0292
	371 - METERS PRIMARY SUBSTATION - MS Rider	0	0	0	0	0		
	371 - METERS SUBTRANSMISSION - MS Rider	0	0	0	0	0		
	371 - METERS TRANSMISSION - MS Rider 903 - METER READING - MS Rider	0 3,105	0 2,498,174	0 22	0 83,307	0 2.584.609		
	CUST MTR REG OBLIG - MS Rider	5,366	2,382,080	332	128,769	2,516,547		
	CUST METERS INSTR TRANSF	34,978	<u>59,090</u>	<u>0</u>	<u>0</u>	94,068		
	Meter Service Revenue Requirements:	53,049 \$53,049	6,381,256 \$6,381,256	883 \$883	365,090 \$365,090	6,800,278 \$6,800,278		
	Check:	R1:	\$6,382,139		\$418,139			
	Revenue Requirement by Old Class Revenue Requirement by New Class	\$62,507,280 \$65,616,248						
		\$50,010,E 1 0						

INTERMEDIATE

FINAL

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16-Nov-01

LARGE

SECONDARY SERVICE DEMAND RATES - R2 AND N2 AND N3

GENERAL SERV SECOND SERV SECOND RESIDENTIAL RATE 2 DST RATE 21 DST RATE 13 DST FROM RATE CALC (10) CLAIMED RATE OF RETURN SUMMARY SCHEDULE - COMPONENT FORMAT **GREATER THAN 5KW** RATE OF RETURN 9.84% 9 84% 9.84% **DEVELOPMENT OF RATE** REVENUES REQUIRED CUSTOMER DEMAND DEMAND LESS THAN 1000 **OVFR 1000** DEMAND COMPONENTS \$298,345 \$504,050 **DEMAND PRODUCTION** \$0 \$0 DEMAND TRANSMISSION \$0 \$0 DEMAND TRANSMISSION OTHER \$0 \$0 DEMAND TRANSM LOAD DISPATCHING \$0 \$0 DEMAND DISTRIBUTION \$298,345 \$504,050 DEMAND SUBTRANSMISSION DEMAND SUBTRANSM SUBSTATIONS \$22,128 \$15,028 \$46,542 \$31,608 1 493 127 1,493,127 \$46 542 1,014,018 1,014,018 \$31,608 DEMAND DIRECT ASSIGN SUBSTATIONS DEMAND DISTR PRIMARY SUBSTATIONS \$0 \$0 \$30,927 \$65,048 2,086,845 2,086,845 \$65,048 10 11 12 13 14 \$133,261 \$59,133 DEMAND DISTRIBUTION PRIMARY \$280,285 8.991.939 8,991,939 \$280,285 DEMAND DISTRIBUTION SECONDARY 3.990.058 3.990.058 \$0 DEMAND DISTRIB LOAD DISPATCHING DEMAND DISTRIB ADD'L FACILITIES REV \$4,416 \$11,018 144,261 144,261 \$11,018 \$0 (\$811) (\$811)DEMAND DISTRIBUTION TRANSFORMERS DEMAND DISTRIBUTION SERVICES 15 16 \$33,452 \$70,359 2,257,228 2,257,228 \$70,359 \$0 \$0 0 \$0 ENERGY COMPONENTS
CUSTOMER COMPONENTS \$0 \$0 ٥ \$63,343 \$63,404 18 370 - METERS SINGLE PHASE SEC - Cust Chrg 94,754 19 \$4,788 99,542 371 - METERS SINGLE PHASE SEC - MS Rider \$5,369 \$0 106.788 370 - METERS SECONDARY - Cust Chrg 371 - METERS SECONDARY - MS Rider \$2.643 32,175 36.162 \$1.505 \$2 964 36.261 370 - METERS PRIMARY - Cust Chrg 371 - METERS PRIMARY - MS Rider \$0 0 \$0 \$0 \$0 0 0 370 - METERS PRIMARY SUBSTATION - Cust Chrg \$0 \$0 0 371 - METERS PRIMARY SUBSTATION - MS Rider \$0 \$0 \$0 \$0 370 - METERS SUBTRANSMISSION - Cust Chrg 0 371 - METERS SUBTRANSMISSION - MS Rider \$0 0 370 - METERS TRANSMISSION - Cust Chrg \$0 0 0 371 - METERS TRANSMISSION - MS Rider \$0 \$0 902 - METER READING - Cust Chrg \$2,443 66,702 73.973 903 - METER READING - MS Rider 903 - CUST RECORDS & COLL \$2,927 14,573 \$5,781 \$17,643 80,285 401,817 419,460 904 - UNCOLLECTIBLE ACCOUNTS \$460 \$0 49.434 49.434 28 908 - CUSTOMER ASSISTANCE \$7,540 \$11,568 197,176 185,608 909 - INFORMATION & INSTRUCT \$0 \$0 CUSTOMER BLACK START
CUST MTR REG OBLIG - Customer Charge \$239 6,023 \$596 111,180 \$4,218 \$145 106.817 CUST MTR REG OBLIG - MS Rider \$4,734 \$165 120,384 CUST METERS INSTR TRANSF CUST SERVICES \$6,723 \$3,203 \$14,115 287,723 \$8,352 373 - STR LIGHT & OUTDOOR LIGHT 34 35 CUSTOMER ADVANCES FOR CONSTR -\$1,287 \$0 -69,764 (69,764) 36 37 CUSTOMER DEPOSITS \$0 -1.013(1.013)\$0 450 - LATE PAYMENT CHARGES -\$575 (30,244) (\$247) -30,244 (\$247) 39 TOTAL COMPANY \$22,811 \$567,453 \$672,093 \$19,876,456 \$503,803 21,450,632

43 CUSTOMER CHARGE (WITHOUT METERING COSTS) 375 Customer Charge: N2 & N3: \$5.41 \$5.49 \$6.67 \$5.07 R2 Demand Charge: Customer Charge: R2: \$4.30 \$/KW-MONTHLY BILLING \$14,115

124.332

2.980.438

\$2.30

91.794

\$106.94

44 MONTHLY ACCESS CHARGE

40 ANNUAL BOOKED KWH SALES

TOTAL ANNUAL BILLS

42 BILLING DEMANDS

Meter Services Rider Revenue Requirements: 371 - METERS SINGLE PHASE SEC - MS Rider 371 - METERS SECONDARY - MS Rider 371 - METERS PRIMARY - MS Rider 371 - METERS PRIMARY SUBSTATION - MS Rider 371 - METERS SUBTRANSMISSION - MS Rider 371 - METERS TRANSMISSION - MS Rider 903 - METER READING - MS Rider CUST MTR REG OBLIG - MS Rider CUST METERS INSTR TRANSF

\$1.86	\$2.32	\$106.94	
			Total
10,157	0	201,543	211,699
2,849	5,607	68,435	76,892
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
5,370	10,609	146,988	162,966
8,952	310	227,201	236,463
6,723	3,203	<u>0</u>	9,926
34.051	19.729	644,167	697.947

N3:

559,843,943

124,200

2,980,438

43,368,239

91.794

Revenue Requirement by Old Class venue Requirement by New Class \$22,040,896,20 \$22,060,488.39

17,366,175

Access Charge:

4,500

N2:

68,906

GENERAL

FINAL

16-Nov-01

PRIMARY DEMAND RATE - N4

		SERV PRIMARY RATE 21 DST (11)	SERVICE PRI RATE 13 DST (8)		
	CLAIMED RATE OF RETURN SUMMARY SCHEDULE - COMI				
	RATE OF RETURN	9.84%	9.84%		ENT OF RATE
	REVENUES REQUIRED		Ĺ	CUSTOMER	DEMAND
1 2	DEMAND COMPONENTS DEMAND PRODUCTION	\$4,400,113 \$0	0		
3	DEMAND TRANSMISSION	\$0	0		
4	DEMAND TRANSMISSION OTHER	\$0	0		
5	DEMAND TRANSM LOAD DISPATCHING	\$0	0		
6 7	DEMAND DISTRIBUTION DEMAND SUBTRANSMISSION	\$4,400,113 \$471,349	0 1,423,235		1,894,584
8	DEMAND SUBTRANSM SUBSTATIONS	\$320,104	983,526		1,303,631
9	DEMAND DIRECT ASSIGN SUBSTATIONS	\$23,576	36,522		60,098
10 11	DEMAND DISTR PRIMARY SUBSTATIONS DEMAND DISTRIBUTION PRIMARY	\$606,713 \$2,741,591	1,989,161 8,721,548		2,595,874 11,463,139
12	DEMAND DISTRIBUTION FRIMARY	\$2,741,391	0,721,340		11,403,139
13	DEMAND DISTRIB LOAD DISPATCHING	\$131,635	260,480		392,116
14	DEMAND DISTRIB ADD'L FACILITIES REV	(\$31,769)	(111,320)		(143,089)
15 16	DEMAND DISTRIBUTION TRANSFORMERS DEMAND DISTRIBUTION SERVICES	\$136,914 \$0	2,009,426 0		
17	ENERGY COMPONENTS	\$0	0		
18	CUSTOMER COMPONENTS	\$407,937	0		
19	370 - METERS SINGLE PHASE SEC - Cust Chrg 371 - METERS SINGLE PHASE SEC - MS Rider	\$0 \$0	0	0	
20	370 - METERS SECONDARY - Cust Chrg	\$6,707	124,316	131,023	
	371 - METERS SECONDARY - MS Rider	\$7,526	139,443		
21	370 - METERS PRIMARY - Cust Chrg 371 - METERS PRIMARY - MS Rider	\$7,317 \$8,210	1,665 1,870	8,982	
22	370 - METERS PRIMARY SUBSTATION - Cust Chrg	\$0,210	0	0	
	371 - METERS PRIMARY SUBSTATION - MS Rider	\$0	0		
23	370 - METERS SUBTRANSMISSION - Cust Chrg 371 - METERS SUBTRANSMISSION - MS Rider	\$0 \$0	0	0	
24	370 - METERS SOBTRANSMISSION - MIS RIGHT	\$0 \$0	0	0	
	371 - METERS TRANSMISSION - MS Rider	\$0	0		
25	902 - METER READING - Cust Chrg	\$25,621	40,361	65,982	
26	903 - METER READING - MS Rider 903 - CUST RECORDS & COLL	\$30,686 \$93,747	48,343 245,136	338,883	
27	904 - UNCOLLECTIBLE ACCOUNTS	\$0	0	0	
28	908 - CUSTOMER ASSISTANCE	\$137,649	324,990	462,639	
29 30	909 - INFORMATION & INSTRUCT CUSTOMER BLACK START	\$0 \$7,116	0 14,323	0 21,439	
31	CUST MTR REG OBLIG - Customer Charge	\$776	67,838	68,614	
32	CUST MTR REG OBLIG - MS Rider	\$870	76,088		
33	CUST METERS INSTR TRANSF CUST SERVICES	\$83,085 \$0	549,205 0	0	0
34	373 - STR LIGHT & OUTDOOR LIGHT	\$0	0	-	-
35	CUSTOMER ADVANCES FOR CONSTR	\$0	(28,802)		(28,802)
36 37	CUSTOMER DEPOSITS 450 - LATE PAYMENT CHARGES	\$0 (\$1,371)	(0) (12,487)		(0) (13,858)
38	ioo Evierviment orantoeo	(\$1,51.)	(12,101)		0
39	TOTAL COMPANY	\$4,808,050	\$16,904,869	\$822,960	\$17,523,692
	ANNUAL BOOKED KWH SALES	531,100,888	1,036,014,295	75.004	
	TOTAL ANNUAL BILLS BILLING DEMANDS	732 1,042,249	74,952 3,103,997	75,684	4,146,246
	Meters	69	6,246 _		1,110,210
43	CUSTOMER CHARGE & DELIVERY CHARGE (WITHOUT METERING COSTS)			\$10.87 MONTHLY	\$4.23 \$/KW-BILLING
44	MONTHLY ACCESS CHARGE - Not Applicable				
	MONTHLY FACILITY CHARGE	\$ 2,146,341		0.52	
				\$/Kw	
	Meter Services Rider Revenue Requirements: 371 - METERS SINGLE PHASE SEC - MS Rider	0	0	Total 0	
	371 - METERS SINGLE FITAGE SEC - MS Rider	14,233	263,759	277,993	
	371 - METERS PRIMARY - MS Rider	15,527	3,536	19,063	
	371 - METERS PRIMARY SUBSTATION - MS Rider 371 - METERS SUBTRANSMISSION - MS Rider	0	0	0	
	371 - METERS GOBTRANSMISSION - MS Rider	0	0	0	
	903 - METER READING - MS Rider	56,307	88,704	145,011	
	CUST MTR REG OBLIG - MS Rider CUST METERS INSTR TRANSF	1,646 <u>83,085</u>	143,926 <u>549,205</u>	145,571 632,289	
		170,797	1,049,129	1,219,926	

INTERMEDIATE

Check: Revenue Requirement by Old Class Revenue Requirement by New Class 21,712,919 21,712,919 FINAL

16-Nov-01

SUBTRANSMISSION DEMAND RATE - N5

		INTERMEDIATE SERV SUBTRNS RATE 21 DST (12)	CONTRACT SUBTRANSM RATE 32 DST (17)	GENERAL SERVICE PRI RATE 13 DST (8)			
	CLAIMED RATE OF RETURN SUMMARY SCHEDULE - COI	MPONENT FORMAT		Subtransmission			
	RATE OF RETURN	9.84%	9.84%	9.84%	DE	:VELOF	PMENT OF RATE
	REVENUES REQUIRED				CUSTOMER	\Box	DEMAND
	DEMAND COMPONENTS	\$1,084,019	\$56,776				
2	DEMAND PRODUCTION DEMAND TRANSMISSION	\$0 \$0	\$0 \$0				
4	DEMAND TRANSMISSION OTHER	\$0 \$0	\$0				
5	DEMAND TRANSM LOAD DISPATCHING	\$0	\$0				
6	DEMAND DISTRIBUTION	\$1,084,019	\$56,776				
7	DEMAND SUBTRANSMISSION	\$387,377	\$48,480				\$460,851
8	DEMAND SUBTRANSM SUBSTATIONS	\$0 \$581,815	\$0				\$0 \$0
10	DEMAND DIRECT ASSIGN SUBSTATIONS DEMAND DISTR PRIMARY SUBSTATIONS	\$0	\$0 \$0				\$0 \$0
11	DEMAND DISTRIBUTION PRIMARY	\$0	\$0				\$0
12	DEMAND DISTRIBUTION SECONDARY	\$0	\$0	\$0			\$0
13	DEMAND DISTRIB LOAD DISPATCHING	\$118,477	\$8,295				\$131,347
14	DEMAND DISTRIB ADD'L FACILITIES REV	(\$3,651)	\$0				(\$5,606)
15 16	DEMAND DISTRIBUTION TRANSFORMERS DEMAND DISTRIBUTION SERVICES	(\$0) (\$0)	\$0 \$0	\$0 \$0			(\$0)
17	ENERGY COMPONENTS	\$0	\$0	ΨΟ			
18	CUSTOMER COMPONENTS	\$226,186	\$13,816				
19	370 - METERS SINGLE PHASE SEC - Cust Chrg	(\$0)	\$0	\$0			
	371 - METERS SINGLE PHASE SEC - MS Rider	\$0	\$0				
20	370 - METERS SECONDARY - Cust Chrg 371 - METERS SECONDARY - MS Rider	\$407	\$0		4	07	
21	370 - METERS SECONDARY - MIS RIGHT	\$456 \$0	\$0 \$0			0	
21	371 - METERS PRIMARY - MS Rider	\$0	\$0	\$0		١	
22	370 - METERS PRIMARY SUBSTATION - Cust Chrg	\$3,047	\$202		3,2	49	
	371 - METERS PRIMARY SUBSTATION - MS Rider	\$3,423	\$229				
23	370 - METERS SUBTRANSMISSION - Cust Chrg	\$407	\$0	\$0 \$0	4	07	
24	371 - METERS SUBTRANSMISSION - MS Rider 370 - METERS TRANSMISSION - Cust Chrq	\$456 \$0	\$0 \$0	\$0 \$0		0	
2-7	371 - METERS TRANSMISSION - MS Rider	\$0	\$0	\$0		0	
25	902 - METER READING - Cust Chrg	\$7,057	\$371	\$13	7,4	41	
	903 - METER READING - MS Rider	\$8,448	\$444	\$15			
26	903 - CUST RECORDS & COLL	\$25,822	\$1,363	\$78	27,2		
27 28	904 - UNCOLLECTIBLE ACCOUNTS 908 - CUSTOMER ASSISTANCE	\$0 \$123,593	\$0 \$8,652	\$0 \$104	132,3	0	
29	909 - INFORMATION & INSTRUCT	\$123,593	\$0,032	\$104	132,3	0	
30	CUSTOMER BLACK START	\$6,405	\$448	\$5	6,8	-	
31	CUST MTR REG OBLIG - Customer Charge	\$215	\$12			49	
	CUST MTR REG OBLIG - MS Rider	\$238	\$12	\$24			
32 33	CUST METERS INSTR TRANSF CUST SERVICES	\$46,214 \$0	\$2,082 \$0	\$176 \$0		_	
34	373 - STR LIGHT & OUTDOOR LIGHT	\$0	\$0 \$0				
35	CUSTOMER ADVANCES FOR CONSTR	\$0	\$0				(\$506)
36	CUSTOMER DEPOSITS	\$0	\$0	(\$0)			(\$0)
37	450 - LATE PAYMENT CHARGES	\$0	\$0	(\$219)			(\$219)
38	TOTAL COMPANY	£4.240.20E	\$70.F00	602 400	\$4CC	170	¢505.067
39	TOTAL COMPANY	\$1,310,205	\$70,592 \$0		\$166,4	70	\$585,867
40	ANNUAL BOOKED KWH SALES	482,876,641	33,885,876				
	TOTAL ANNUAL BILLS	204	12		2	240	
42	BILLING DEMANDS	893,452	125,917	64,496			1,083,865
					4000		40.54
43	CUSTOMER CHARGE (WITHOUT METERING COSTS)				\$693	63	\$0.54
	(WITHOUT METERING COSTS)						
45	MONTHLY FACILITIES CHARGE	\$636,598			\$0	.59	
l!	(subtransmission)					_	
	Meter Services Rider Revenue Requirements:				Total		
	371 - METERS SINGLE PHASE SEC - MS Rider	0	0	0	0		
	371 - METERS SECONDARY - MS Rider	863	0		863		
	371 - METERS PRIMARY - MS Rider	0	0	0	0		
	371 - METERS PRIMARY SUBSTATION - MS Rider	6,470	431	0	6,901		
	371 - METERS SUBTRANSMISSION - MS Rider	863	0		863		
	371 - METERS TRANSMISSION - MS Rider 903 - METER READING - MS Rider	0 15,505	0 815	0 28	0 16,348		
	CUST MTR REG OBLIG - MS Rider	453	24	46	523		
	CUST METERS INSTR TRANSF	46,214	2,082		48,471		
		70,366	3,352		73,969		
	OL I						
	Check: Revenue Requirement by Old Class	\$1,462,904					
	Revenue Requirement by New Class	\$1,462,904					

CILCO Meter Support Worksheet Revised

CENTRAL ILLINOIS LIGHT COMPANY Meter Support Worksheet						Allocator				Ins	strument			94.31%								
motor capport fromonoc		Meter	Meter	Instrumer	ıt	for					ansformer											
	Quantity	Cost	Cost	Transform		Meter					Costs											
	-																					
1 Single phase - class 100/200 - no demand	170,548 \$	24.00			- \$	3,860,251.65	54.64% \$	2,760,325.13		\$	-	0.00% \$	-									
1 Single phase - class 320/400 - no demand	1,926 \$	221.00			- \$	401,426.74	5.68% \$	287,045.62		\$	-	0.00% \$	-									
1 Single phase - class 200 fixed demand	3,369 \$	24.00			- \$	76,255.29	1.08% \$	54,527.38		\$	-	0.00% \$	-									
1 Single phase controlled	8 \$	230.00	\$ 230.00	\$	- \$	1,735.30	0.02% \$	1,240.85 \$	3,103,138.98	\$	-	0.00% \$	-		175,851 \$	17.65	\$	1.47				\$ 2.65
2 Three phase - self-contained (3 or 4 wire) - no demand	2.694 \$	150.00	\$ 150.00	\$	- s	381.106.71	5.39% \$	272.515.50		s		0.00% \$	_									
2 Three phase - self-contained (3 or 4 wire)	- S	150.00			. \$	-	0.00% \$	- \$	272,515.50		_	0.00% \$	- \$		2.694 \$	101.16	\$	8.43 \$	_	s	_	\$ 9.61
2 Throo phace con contained (e or 1 mile)	Ť	100.00	100.00	•	•		0.0070 \$	•	2,2,0,0.00	•		0.00% Q	Ť		2,00. 0	101.10	•	J. 10 Q		•		ψ 0.01
3 Three phase - class 200 - demand/tou	4,374 \$	150.00			- \$	618,767.91	8.76% \$	442,458.36		\$	-	0.00% \$	-									
3 Single phase 200 demand/tou	250 \$	89.00			- \$	20,983.98	0.30% \$	15,004.87		\$	-	0.00% \$	-									
3 Single phase - class 320/400 - demand/tou	59 \$	221.00			- \$	12,297.08	0.17% \$	8,793.19		\$	-	0.00% \$	-									
3 Single phase - class 200 - demand/tou	9,988 \$	89.00			- \$	838,351.77	11.87% \$	599,474.77		\$	-	0.00% \$	-									
3 Single phase - class 320/400 - demand/tou	579 \$	221.00			- \$	120,678.13	1.71% \$	86,292.53		\$	-	0.00% \$	-									
3 Single phase - class 200 - demand/tou	6 \$	89.00			- \$	503.62	0.01% \$	360.12		\$	-	0.00% \$	-									
3 Three phase - class 320/400 - demand/tou	343 \$	221.00	\$ 221.00	\$	- \$	71,489.81	1.01% \$	51,119.75 \$	1,203,503.59	\$	-	0.00% \$	- \$	-	15,599 \$	77.15	\$ (6.43 \$	-	\$	-	\$ 7.61
4 Single phase - transformer rated - demand/tou (3 wire)	5 \$	89.00	\$ 89.00	\$. s	419.68	0.01% \$	300.10		s	_	0.00% \$	_									
4 Three phase - transformer rated - demand/tou	66 \$	150.00			.00 \$	9,336.69	0.13% \$	6,676.33 \$	6.976.43	s	22.034.59	1.03% \$	6.679.13 \$	6.679.13	71 \$	98.26	s i	B.19 \$	94.07	s	7.84	\$ 17.21
Times phase transferred rates demand to	00 Q	100.00	, ,,,,,,,	ψ 00.	.00 Q	0,000.00	0.1070 \$	σ,σ,σ.σσ φ	0,070.10	•	22,001.00	1.0070 Q	0,070.10	0,070.10	•	00.20	•	J. 10 Q	01.01	•	7.01	V
5 Three phase - transformer rated - 120/240 3 wire	66 \$	150.00			.00 \$	9,336.69	0.13% \$	6,676.33		\$	22,034.59	1.03% \$	6,679.13									
5 Three phase transformer rated - 120/208 4 wire	1 \$	150.00			.00 \$	141.47	0.00% \$	101.16		\$	333.86	0.02% \$	101.20									
5 Three phase - transformer rated - no demand (3 wire)	422 \$	150.00			.05 \$	59,698.23	0.84% \$	42,688.03			140,907.72	6.61% \$	42,712.02									
5 Three phase - transformer rated - no demand (4 wire)	158 \$	150.00			.05 \$	22,351.47	0.32% \$	15,982.72			52,756.92	2.47% \$										
5 Three phase - transformer rated - 120/240 3 wire	592 \$	150.00	\$ 150.00	\$ 354	.05 \$	83,747.28	1.19% \$	59,884.62		\$ 1	197,671.50	9.27% \$	59,918.28									
5 Three phase transformer rated - 120/208 4 wire	2,468 \$	150.00	\$ 150.00	\$ 354	.05 \$	349,135.62	4.94% \$	249,654.14 \$	374,987.00	\$ 8	824,076.44	38.64% \$	249,794.44 \$	381,875.90	3,773 \$	99.39	\$	8.28 \$	101.21	\$	8.43	\$ 17.90
6 Three phase transformer rated - 480v 3 wire	99 \$	150.00	\$ 150.00	¢ 644	.45 \$	14.005.04	0.20% \$	10.014.49		e	60.170.30	2.82% \$	18.238.85									
6 Three phase transformer rated - 277/480 4 wire	565 \$	150.00			.45 \$	79,927.73	1.13% \$	57,153.40			343,396.15		104.090.40									
6 Three phase transformer rated - 2777460 4 wire	5 \$	150.00			.45 \$	707.33	0.01% \$	505.78		9 3	3.038.90	0.14% \$	921.15									
6 Three phase transformer rated - 277/480 4 wire	147 \$	150.00			.45 \$	20.795.36	0.29% \$	14.870.00 \$	82.543.67	÷	89.343.78	4.19% \$		150.332.33	016 6	101.16		8.43 \$	184.23		15.05	\$ 24.97
6 Three phase trasformer rated - 277/460 4 wire	147 \$	150.00	\$ 150.00	р 044	.45 ş	20,795.30	U.29% \$	14,070.00 \$	02,343.07	Þ	09,343.70	4.1970 Þ	27,001.93 \$	150,552.55	010 \$	101.10	a	5.43 ş	104.23	3 1	10.00	\$ 24.97
7 Three phase transformer rated - 5kv 3 wire	8 \$	150.00	\$ 150.00	\$ 4,016	.46 \$	1,131.72	0.02% \$	809.25		\$	30,303.39	1.42% \$	9,185.58									
7 Three phase transformer rated - 5kv 4 wire	20 \$	150.00	\$ 150.00	\$ 5,273	.35 \$	2,829.30	0.04% \$	2,023.13		\$	99,465.93	4.66% \$	30,150.16									
8 Three phase transformer rated - 15kv 3 wire	15 \$	150.00	\$ 150.00	\$ 4,016	.46 \$	2,121.98	0.03% \$	1,517.35		\$	56,818.85	2.66% \$	17,222.96									
8 Three phase transformer rated - 15kv 4 wire	39 \$	150.00	\$ 150.00	\$ 5,176	.83 \$	5,517.14	0.08% \$	3,945.10 \$	8,294.83	\$ 1	190,408.47	8.93% \$	57,716.70 \$	114,275.40	82 \$	101.16	\$	B.43 \$	1,393.60	\$ 11	16.13	\$125.75
Total	198,820		\$ -		\$	7,065,050.69	100% \$	5,051,960.00 \$	5,051,960.00	\$ 2,1	132,761.38	100% \$	646,483.63 \$	653,162.76	198,886							

Meters by Rate Class:

Rate 1	183,228
Rate 2	17,958
Rate 13	22,735
Rate 15	5
Rate 22	229
	224,155

Meter Reading \$2,825,670.00 \$ 14.21 \$ 1.18

RIDER MS: METERING SERVICE

CILCO Revised Exhibit 2.9

Docket Nos. 01-0465/01-0530/01-0637 (consol)

ICC Staff Exhibit 6.0

Schedule 5

(1) Availability

This Rider is applicable to the Rate RDS, Residential Delivery Service and to Rate NDS, Non-Residential Delivery Service.

This Rider is applicable to new metering equipment to be installed by the Company after the effective date hereof, and is not a replacement for any lease or rental the customer may have for existing metering equipment.

2) Nature of Service

Meters will be installed in accordance with the Company's standard practices. <u>Typically, residential and small commercial customers served at secondary voltages, and billed on either a KWH or KW basis, will be charged for non-transformer rated metering. Customers served at higher voltages than secondary service will typically be charged for instrument transformation metering. Interval metering is required as a standard for all accounts for which demands are greater than 1,000 Kva.</u>

Rate RDS and Rate NDS customers requesting non-typical meter configurations for their rate, or customers requiring non-typical meter configurations based on their load characteristics will be charged based on actual meter configuration in service.

Service hereunder is subject to the Company's General Terms and Conditions for Electric Service.

(3) Rates and Charges

Customers taking standard Metering Service under this Rider shall be charged a monthly charge per meter as outlined below:

Issued - ______, 2002, pursuant to ICC Order entered _____, 2002, in Docket Nos. 01-0637/01-0530/01-0465 (Cons.)—

Effective - May 1, 2002

Docket Nos. 01-0465/01-0530/01-0637 (Consolidated) ICC Staff Exhibit 6.0 Attachment 1

CILCO Response to Staff Data Request DLS-11

In regard to CILCO Schedule C-1, Total Operating Revenues are listed as \$112,912,000. However, CILCO's cost of service study uses a figure of \$109,200,000. Please explain this discrepancy and provide documentation showing how these figures are used to arrive at CILCO's proposed DST rates and charges.

Response:

The cost of service study shows the total operating revenues of \$109,190,917 which represents the operating revenues for electric distribution services of \$108,335,533 plus the other operating revenues related to electric distribution services of \$855,383. The Company's total operating revenues of \$109,190,917 are before adjustment for the proforma adjustments and the Company's full requested return of 9.84%.

At the Company's requested rate of return of 9.84%, the revenue requirement for the electric distribution delivery services for retail is \$111,928,152 and the revenue requirement for the electric distribution delivery services for wholesale is \$129,202 which results in a revenue requirement for electric distribution delivery services of \$112,057,354. Combined with the other revenues for electric distribution services of \$855,383, the total electric distribution revenues are \$112,912,737.

Docket Nos. 01-0465/01-0530/01-0637 (Consolidated) ICC Staff Exhibit 6.0 Attachment 2

CENTRAL ILLINOIS LIGHT COMPANY

Residential Delivery Services - Docket No. 01-0637 Response to Staff Data Request DLS-11 through DLS-20

In regard to CILCO's cost of service study, please provide a definition of the distribution functional category labeled "customer meter regulatory obligation". Was this category used in CILCO's 1999 DST cost of service study? Why or why not?

Response: The functional category for customer meter regulatory obligation represents an allocation of the costs related to the investments remaining on the records of the Company, for customers where their meter has been removed, as it relates to providing metering services. The Company did not file a 1999 DST cost of service study – the Company filed a 1997 test year for the last DST filing. The allocation of these costs was changed in the Company's Errata filing based upon input from the ICC Staff expressing concern over this allocation methodology.

Prepared by: V. Bilsland

Docket Nos. 01-0465/01-0530/01-0637 (Consolidated) ICC Staff Exhibit 6.0 Attachment 3

CENTRAL ILLINOIS LIGHT COMPANY

Residential Delivery Services - Docket No. 01-0637 Response to Staff Data Request DLS-11 through DLS-20

DLS-14 Why are the costs associated with "customer meter regulatory obligation" recovered in customer charges? Why aren't the costs recovered in meter charges? What would be the result of recovering such costs in meter service rates in Rider MS? How would Rider MS rates be affected?

Response:

It is appropriate to recover costs related to the investments remaining on the Company's books from the customer who caused those costs to be incurred. When the Company removes its meter from a customer's premises, the capitalized costs for installation remains on the Company's books until the meter is retired. When the meter is removed, it is put into inventory. Under the Customer Choice Law, the Company is required to stand ready to provide standard metering services. 220 ILCS Section 16-102. Definitions. "Delivery services" means those services provided by the electric utility that are necessary in order for the transmission and distribution system to function so that retail customers located in the electric utility's service area can receive electric power and energy from suppliers other than the electric utility, and shall include, without limitation, standard metering and billing services. This obligation to serve the standard metering requirements should be recovered from all customers.

Under the Company's Errata filing, the methodology for recovering costs for metering assets remaining on the Company's books was revised. The capitalized installation costs were removed along with the capitalized meter costs. These costs plus assigned metering services expenses and related meter reading costs plus overhead were put into the Company's M S Rider to represent the costs the customer would not have to pay CILCO if they chose another meter service provider. The assignment of these costs properly reflect the Commission Third Interim Order for Docket #99-0013.

Prepared by: V. Bilsland